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OF COUNSEL

ELECTRONICALLY FILED

USDC SDNY DOCUMENT

DATE PILED:

DOC#:

*Also Admitted in TX
**Also Admitted in CA and NJ
***Admitted in DC

April 6, 2006

Via First Class Mail

Honorable Shira A. Scheindlin
United States District Judge
for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Rom 1620
New York, NY 10007-1312



Re: U.S. Commodity Futures Trading Commission v. Richmond Global Associates, LLC, Richmond Global Director, LLC, Richmond Global MCA, LLC, Richmond Global Managed Account, LLC, Richmond Global, Ltd., RG Group Holdings, LLC, Vincenzo Danio, Joseph Pappalardo, Ronald Turner, and Miron Vinokur, 05 CV 2181 (S.D.N.Y.) (SAS)

Dear Judge Scheindlin:

Enclosed please find the Receiver's Sixth Request for Compensation, which the Receiver submits pursuant to Paragraph VIII of the *ex parte* statutory restraining order entered on February 16, 2005 in the above-referenced matter. This Request for Compensation covers services provided between February 1, 2006 and March 31, 2006.

I. THE CLIENT ACCOUNT SPREADSHEETS

As I previously advised the Court, the Receiver's expert, Mr. Joseph Merlino, and I have evaluated Richmond Global's client account data, the defendants' books and records, and subpoenaed bank records for the purposes of asset allocation and restitution.

Enclosed with the Fifth Request for Compensation was a copy of client account spreadsheets, along with definitions of the spreadsheets' terms. We have furnished the spreadsheets and definitions to the defendants' counsel and to the CFTC and USAO.

The USAO contacted me and Mr. Merlino on several occasions to discuss the spreadsheets and related restitution issues. As always, Mr. Merlino is available to discuss the spreadsheets should the Court or any party wish to do so.

II. EXPERT REPORT

Given the investigation that we have already undertaken, we do not believe that we will uncover additional receivership assets. And, it is our understanding that three individual defendants have pled guilty and are waiting for sentencing, and that the remaining defendant is likely to enter a plea as well. In light of the foregoing, and to preserve limited receivership assets, the Receiver believes that it is not necessary or cost-effective to prepare an expert report analyzing the company's books and records, summarizing interviews with former employees, traders and clients, and opining on the defendants' trading practices and client account matters. We have discussed this matter with CFTC attorneys, who agree that Mr. Merlino does not need to prepare a detailed expert report.

We believe that the top priorities are to resolve the defendant entities' tax liabilities and formulate proposed asset allocation plans. However, we would be pleased to prepare an expert report should the Court request one.

III. PROPOSED ASSET ALLOCATION PLANS AND TAX LIABILITIES

As I previously advised, we must resolve any potential tax liens and/or liabilities before distributing any of the restrained funds. In light of my review of legal precedent and consultation with a tax expert, we have determined that the best course of action is to reach a settlement with the Internal Revenue Service and New York State as to any tax liability before finalizing a comprehensive asset allocation plan, as courts addressing this issue have held that tax liens take priority over investors' claims.

At this juncture, I have received the requisite information from the New York State Department of Taxation and the New York State Department of Labor on outstanding tax liens and warrants against all the defendant entities, but have not yet received similar information from the IRS. In addition to pursuing this information through the regular channels, I have also obtained the assistance of an IRS contact who previously provided assistance in connection with another receivership matter. I am seeking to ensure that necessary documents are provided to the IRS' general counsel's office. We are attempting to resolve the tax issue expeditiously.

We have also requested that the defendants' accountants, Del Rey & Company, provide the Receiver with information concerning year 2005 federal, state and local tax liabilities.

Following resolution of the tax liability issue, we will provide the Court with proposed asset allocation plans, and the Receiver's recommendation as to which plan or plans should be selected.

IV. FORMER CUSTOMERS

Mr. Merlino and I continue to communicate with former clients to confirm account information and to provide them with updates on the status of the civil and criminal suits, and the pending distribution of the restrained funds under a court-approved asset allocation plan.

Enclosed for the Court's review and approval are the Receiver's and Mr. Merlino's detailed bills for February 1, 2006 through March 31, 2006, which include disbursements. Should these bills be approved for payment, such payment will be made from the Receiver's operating account.

The Fourth Request for Compensation is:

• Receiver: \$3,120.00

• Joseph Merlino: \$1,650.00

This letter contains an approval line to authorize payment of the Receiver's Sixth Request for Compensation. I would be pleased to answer any questions the Court may have regarding the foregoing or the enclosed bills.

Very truly yours,

Natalie A. Napierala,

Counsel to the Receiver,

John W. Moscow

encs.

cc: Counsel and Parties of Record (w/out enclosures)

Payment of the Receiver's Sixth Request for Compensation is approved in the amounts

submitted.

SO ORDERED, at New York, New York, this

UNITED STATES DISTRICT JUDGE

ATTORNEYS AT LAW

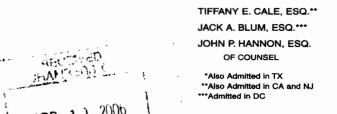
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HEATHER J. HAASE, ESQ.*

Tax ID No.: 20-2416976

NC

File No. 6030

FOR PROFESSIONAL SERVICES RENDERED:

Re: U.S. Commodity Futures Trading Commission v. Richmond Global Associates, LLC, Richmond Global Director, LLC, Richmond Global MCA, LLC, Richmond Global Managed Account, LLC, Richmond Global, Ltd., RG Group Holdings, LLC, Vincenzo Danio, Joseph Pappalardo, Ronald Turner, and Miron Vinokur, 05 CV 2181 (S.D.N.Y. SS).

February and March 2006

= no charge

JWM	= John W. Moscow, Esq.	Hourly Rate: \$295.00
NAN	= Natalie A. Napierala, Esq.	Hourly Rate: \$235.00
HJH	= Heather J. Haases, Esq.	Hourly Rate: \$195.00
TEC	= Tiffany E. Cale, Esq.	Hourly Rate: \$170.00
MDO	= Maria D. O'Kane, paralegal	Hourly Rate: \$ 90.00

<u>DATE</u>	DESCRIPTION	<u>HRS</u>	ATTY.
01-31-06	Research IRS website for Office of General Counsel to address issues of possible federal tax liabilities of defendant entities; various telephone calls re: the foregoing.	.3	MDO
02-03-06	Confer w/ NAN re: contact at the NYS Dept. of Labor, William Ballinger, and letter re: the same; search contact by telephone and internet to obtain new address; arrange for hand delivery of letter re: unemployment tax issues related to RGA entities.	.4	MDO
02-08-06	Review letter from CFTC to the Court re: pleas of defendants in criminal matters.	.1	NAN
02-09-06	Telephone conference w/ Joseph Merlino and AUSA's Neil Barofsky and Roberto Finzi regarding client account spreadsheets, trading, restitution and asset allocation; draft emails to AUSA Barofsky re: the foregoing; review client account issues for purposes of continued discussion w/ AUSA and confer w/ expert Merlino re: the foregoing.	1.0	NAN
02-09-06	Confer w/ expert Joe Merlino re: RGA Bank accounts and review bank records.	.2	MDO
02-10-06	Communicate w/ AUSA Neil Barofsky re: restitution issues and meeting w/ Receiver's expert re: the foregoing; communicate w/ expert Merlino re: the foregoing; draft, review, revise and finalize Fifth Request for Compensation to the Court re: asset allocation, restitution, tax liabilities and other receivership matters; confer w/ Receiver Moscow re: the foregoing.	3.8	NAN
02-10-06	Review, revise Fifth Request for Compensation.	.2	TEC
02-13-06	Receive letter from defendants' counsel re: potential plea and confer w/ Receiver re: the foregoing.	.2	NAN
02-14-06	Meet and confer w/ expert Joe Merlino re: client account and trading issues, and expert report re: the foregoing; conference w/ K. Roth, CFTC, re: the foregoing and criminal pleas; receive email from Ms. Roth attaching plea of defendant Danio and reply to the same; conference w/ AUSA Neil Barofsky and expert Merlino re: receiver's spreadsheets and client account and trading issues, and draft email to AUSA re: the same.	1.5	NAN

02-14-06	Confer w/ expert Merlino re: subpoenaed bank records of defendant entities; review all subpoenaed records; organize JP Morgan Chase subpoenaed bank records;	1.1	MDO
	attend to client account issues.		
02-15-06	Telephone conference w/ K. Roth, Esq., CFTC, re: receiver's expert report.	.1	NAN
02-15-06	Continue to review and organize subpoenaed bank records from JP Morgan Chase.	.2	MDO
02-16-06	Telephone call w/ counsel at NYS Dept. of Taxation and Finance on liens, assessment and warrants of defendant entities and dissolution of defendant entity; confer w/ MDO re: the foregoing and review issues related to tax liabilities; review letter from CFTC to client re: status of civil suit; review federal case law on tax issues and allocation of assets; commence review of plea transcript of defendant Danio; receive and reply to emails amongst MDO and expert Merlino re: amount of frozen assets for purposes of allocation plans.	1.2	NAN
02-16-06	Confer w/ NAN and Donald Bray from NYS Dept. of Taxation and Finance on dissolution and tax liabilities of defendant entity; obtain banking information and account balance on specific defendant entity.	.4	MDO
02-22-06	Review updated court docket and confer w/ MDO re: the foregoing.	.2	NAN
03-02-06	Telephone call w/ K. Roth, Esq., CFTC, re: possible depositions of employees/traders and information re: the foregoing; review various Richmond Global files, confer w/ expert Merlino, email Ms. Roth requested information, and confer w/ Ms. Roth and expert Merlino re: discovery, employee and trader information.	1.0	NAN
03-07-06	Receive and review documents from NYS Dept. of Taxation and Finance re: warrants, liens and other liabilities against defendant entities, and confer w/counsel for NYS Dept. of Tax re: the foregoing.	.4	NAN
03-09-06	Review prior letters from defendants' accountants, Del Rey, re: response to RGA tax issues and confer w/ NAN re: the same; draft letter to Del Rey re: assisting Receiver with dissolution of Richmond Global Ltd. per request of NYS Dept. of Taxation.	1.0	MDO

03-10-06	Continue to review potential tax liabilities against defendant entities, and review, revise letter to accountants requesting assistance w/ filing certain forms required by NYS Dept. of Taxation; confer w/ MDO re: the foregoing.	.8	NAN
03-10-06	Review and revise letter to defendants' accountants, Del Rey, re: RGA tax issues and dissolution of entities; confer w/ NAN re: tax liabilities of RG Ltd. and letter to Del Rey re: the same.	1.2	MDO
03-13-06	Receive and reply to email from CFTC, review letter from CFTC to Court, and review joint proposed discovery order.	.3	NAN
03-27-06	Telephone call w/ NYS Dept. of Labor re: outstanding payments for 1Q and 2Q taxes; review documents previously sent from Dept. of Labor and defendants' accountants, confer w/ MDO re: the foregoing, and draft letter to NYS Dept. of Labor attaching prior correspondence on RG entities and requesting specific tax information; review w/ MDO issues related to payment of franchise taxes.	1.0	NAN
	0 JWM Hours at \$295.00:	\$0	
	11.6 NAN Hours at \$235.00:	\$ 2,726.00	
	0 HJH Hours at \$195.00:	\$0	
	0.2 TEC Hours at \$170.00:	\$34.00	
	4.8 MDO Hours at \$90.00:	\$432.00	
	Subtotal:	\$3,192.00	
	Disbursements:		
	Clerks Cost:	\$0	
	Copying:	\$0	
	Computer Technician	\$0	
	Courier:	\$0	
	Courier:	\$0	
	Court costs:	\$0	
	Faxing:	NC	

FedEx: \$0 Locksmith \$0 \$0 Movers Long distance telephone: \$0 Misc. \$0 \$0 Pacer: \$0 Postage: Stenography: \$0 Surety Bond \$0 Telephone: NC Travel: \$0 \$0 Westlaw: Subtotal (Total Disbursements): \$0.00 **Balance Due:** \$3,192.00 **Outstanding Credit:** (\$72.00) \$3,120.00 **Total Balance:**